



Form Approved
OMB No. 2040-0001
Approval Expires 7-31-85

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code			NPDES										yr/mo/day					Inspec. Type		Inspector		Fac Type						
1	N	2	5	3	A	R	0	0	3	6	4	1	2	11	12	0	4	0	4	2	1	17	18	R	19	S	20	2
Remarks																												
A F 1 N - 5 4 0 0 0 6 8																												
Inspection Work Days				Facility Evaluation Rating				BI		QA		Reserved																
67				69				70	N	71	N	72	N	73			74	75										80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time /Date	Permit Effective Date
Cedar Chemical Corporation 49 Phillips Road 311 Highway 242 South, Helen, Arkansas Phillips County		1000 / April 21, 2004	June 1, 2002
		Exit Time/Date	Permit Expiration Date
		1045/ April 21, 2004	May 31, 2007
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)		Other Facility Data	
Gary Hill / operator			
Name, Address of Responsible Official/Title/Phone and Fax Number		Sample Location	
Mike Bates/ Hazardous Waste Division Chief/ 501-862-0831 Arkansas Dept. of Environmental Quality 8001 National Drive/ Post Office Box 8913/ Little Rock, Arkansas 72219-8913		N-34-31-04.9 W-90-39-10.2	
		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	U	Flow Measurement	M	Operations & Maintenance	U	Sampling
U	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other: Effluent Limits

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Cedar Chemical Corporation was a chemical manufactured that operated an onsite wastewater treatment system that included a finishing pond, equalization pond, biological treatment pond, clarifier and associated water collection and transfer system. The wastewater treatment system discharge by pump to outfall 002 to the Mississippi River. Cedar Chemical ceased operation and in March 2002 filed Chapter 11 bankruptcy. Through the bankruptcy court, Cedar Chemical was abandoned to Arkansas Department of Environmental Quality control and all existing wastewater was left on site. At the time of the inspection, no chemical processes are currently in operation at the site and the treatment system is no longer receiving or treating any new process wastewater. At the present time the only inflow to the treatment system is from rainfall events directly into the treatment ponds and from the storm water runoff discharge from the old process area which is approximately 25 acres in size. According to a letter from EPA sent to ADEQ dated October 21, 2003, ADEQ "has authority to discharge effluent from Cedar Chemical

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Dale Washam 	Arkansas Dept. of Environmental Quality/ Mammoth Spring/870-625-7477 /870-625-7699	May 10, 2004
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

wastewater treatment system through Outfall 002 to the Mississippi River." The discharge from the treatment system to Outfall 002 will only be allowed by ADEQ when necessary to relieve some of the volume of water to prevent an uncontrolled release or overflow of the walls of the wastewater treatment ponds. The October 21, 2003 letter stated that when discharging "ADEQ will sample for the necessary parameters required by Cedar's existing NPDES permit and provide the results of that sampling to EPA as soon as possible." EPA also expects ADEQ to "report in writing to {Vivian Hare} the volume of the discharge, the duration of the time which the discharge occurred and any observable impacts on the receiving water" within five (5) days of the discharge. ADEQ has secured through contract a class I operator part time to oversee the wastewater treatment system. The operator has been monitoring the discharge flow and the pH of the discharge flow. The inspection on April 21, 2004 and the review of Department files have revealed the following items:

1. The effluent from the discharge point 002 was not being monitored at the frequency as required by the permit in Part 1, pages 1 thru 5. The effluent according to Technical Services Division of ADEQ was last sampled for all the parameters listed in Part 1, pages 1 thru 5 of the permit except Acute Biomonitoring on November 19, 2003, by Water Division staff. The Priority Pollutants and the Acute Biomonitoring according to permit, is to be monitored once per quarter and according to ADEQ Hazardous Waste Division staff there were discharges in the first quarter of 2004 but the discharge was not sampled.
2. The NPDES permit for Cedar Chemical requires in Part 1, page 1 that BOD, TSS and COD be monitored once per week when there is a discharge. According to Department records the last time the effluent from 002 discharge point was monitored for these parameters was on November 19, 2003, for the quarterly sample. The facility has had a number of weeks that has had discharges since November 19, 2003, which were not sampled.
3. The samples collected on November 19, 2003, were grab samples but the permit requires BOD, TSS, COD, Acute Biomonitoring, and Priority Pollutants to be 24-hour composite sample. The sample is to be collected proportional to flow.
4. The results from the monitoring of the effluent on November 19, 2003, have not been submitted to EPA as per the requirements in the October 21, 2003 letter.
5. The operator that was at the site was monitoring pH and flow daily when discharging and submitting the information to ADEQ Hazardous Waste Division (HWD). The daily analytical results for flow and pH have not been reported to EPA as directed in the letter dated October 21, 2003, from EPA.
6. Not all of the records required in Part II Section C-3 of the permit are being kept by the operator for pH sampling. Records should include the following: (a) date and time of sampling along with date and time of analyses, (b) The name of the person who collected the sample along with person who performed the analyses, (c) The analytical technique or method used, (d) The exact location of sampling, preservatives used and the method of sampling, (e) All the results of analyses.
7. The operator who was doing the effluent monitoring for pH was not keeping calibration records nor did the records include maintenance that was performed on the pH meter as required by the NPDES permit in Part II Section C-3.
8. Duplicate analysis for pH was not performed by the operator once a batch or once every 10 samples of the batch as required in Part II Section C-3.
9. One of the two discharge pumps was not operational at the time of the inspection. The operator was concern that the second pump may go out also. On most permitted facilities that would be sited as a violation of part II Section B-1a, of the permit.
10. The operator did not know nor did he have any records on when the flow meter was last calibrated. He knew the meter was calibrated when Cedar Chemical was in operation. No flow checks were being perform to insure that the flow meter was operating within a +/- 10 % of the true value. This is required in Part II Section C-2 of Cedar Chemical NPDES Permit.
11. The vegetation on the banks of the lagoons, around the pump stations and control building should be mowed and maintained in the very near future. This could be required by the permit in Part II Section B-1 .

Since the inspection, ADEQ Hazardous Waste Division staff as drafted a "Memorandum of Understanding" between the Divisions of the Department to address corrective action for most of the items noted above.

DEC 05 2005

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460Hazardous Waste
R - 38469Form Approved
OMB No. 2040-0003
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NPDES Compliance Inspection Report

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1	N	2	S	3	A	R	0	0	3	6	4	1	2	11	12	0	5	1	1	0	9	17	18	C	19	S	20	2
Remarks																												
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Inspection Work Days								Facility Evaluation Rating								BI		QA		Reserved								
67	0	0	1	69	70	3	71	N	72	N	73		74	75														80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time /Date		Permit Effective Date	
Cedar Chemical Corporation 49 Phillips Road 311 Highway 242 South Helena, Arkansas 72342 Phillips County		0915 / November 9, 2005		June 1, 2002	
		Exit Time/Date		Permit Expiration Date	
		1045 / November 9, 2005		May 31, 2007	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)				Other Facility Data	
Gary Hill/ Operator/ (870) 995-3502					
Name, Address of Responsible Official/Title/Phone and Fax Number				Sample Location:	
Mike Bates/ Hazardous Waste Division Chief/ (501) 862-0831 Arkansas Department of Environmental Quality P.O. Box 8913 Little Rock, Arkansas 72219-8913				N 34 31' 04.9" W 90 39' 10.2" Phillips County	
Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>					


Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Sampling
S	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other: Effluent Limits

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Cedar Chemical Corporation was a chemical manufacturer that operated an on-site wastewater treatment system that included an equalization pond, biological treatment pond, finishing pond, clarifier and storm water collection system. The wastewater treatment system discharged by pump from Outfall 002 to the Mississippi River. Cedar Chemical ceased operation and filed Chapter 11 bankruptcy in March 2002. Through the bankruptcy court, Cedar Chemical was abandoned to ADEQ control. At the time of inspection, no chemical processes were in operation at the site and the treatment system is no longer receiving or treating any new process water. The only inflow to the treatment system is storm water runoff from the 25 acre site and rainfall events directly into the treatment ponds.

In July 2004, a Protocol for the operation of the Cedar Chemical Company Wastewater Treatment Plant between the Hazardous Waste, Water, and Technical Assistance Divisions of ADEQ was adopted. At the time of inspection, the operator of the facility appeared to be following all conditions set forth in the protocol. There are a couple of items to note. The wastewater levels in the Primary and Finishing Ponds were extremely low. Also, the flow meter has not been calibrated and the operator has no means to manually conduct flow checks.

Name(s) and Signature(s) of Inspector(s)		Agency/Office/Telephone/Fax		Date	
Steven L. Henderson 		ADEQ/ Stuttgart/ (870) 673-8846/ (870) 673-7236		November 18, 2005	
Signature of Reviewer		Agency/Office/Phone and Fax Numbers		Date	

Gary Hill

From: "Foster, Melanie" <FOSTER@adeq.state.ar.us>
To: "Gary Hill" <bearhill@cox-internet.com>
Sent: Wednesday, November 02, 2005 9:49 AM
Subject: ADEQ COA with 1 Sample per page.rtf

Gary, here's a copy of the analytical results.

Thanks, Melanie

Report Date: 02-Nov-05

- CERTIFICATE OF ANALYSIS -

Attn:
Our Lab#: 2005-3082
Your Sample ID: Cedar Chem Outfall 002
Description: Cedar Chemical AR0036412
Sample Type: Special Sample

Phone:
FAX:

Test Group	Test	Sample Water Result	Units	Analysis Date
BOD5	5-day biochemical oxygen demand	3.63	mg/L	10/19/2005
TOC	Total Organic Carbon	16.5	mg/L	10/19/2005
TSS	Total suspended solids	6.25	mg/L	10/19/2005

Reported by: Jeff

ruchr

1

11/2/2005



Polish Pond

Date	Time	Meter Reading	GPM	pH	Total gallons pumped
9-5-03	OFF				
9-6-03	OFF				
9-7-03	OFF				
9-8-03	OFF				
9-9-03	OFF				
9-10-03	OFF				
9-11-03	OFF				
9-12-03	OFF				
9-13-03	OFF				
9-14-03	OFF				
9-15-03	OFF				
9-16-03	OFF				
9-17-03	OFF				
9-18-03	OFF				
9-19-03	OFF				
9-20-03	OFF				
9-21-03	OFF				
9-22-03	OFF				
9-23-03	OFF				
9-24-03	OFF				
9-25-03	OFF				
9-26-03	OFF				
9-27-03	OFF				
9-28-03	OFF				
9-29-03	OFF				
9-30-03	OFF				
10-1-03	OFF				
10-2-03	OFF				
10-3-03	OFF				
10-4-03	OFF				
10-5-03	OFF				
10-6-03	OFF				
10-7-03	OFF				
10-8-03	OFF				
10-9-03	OFF				
10-10-03	OFF				
10-11-03	OFF				
10-12-03	OFF				
10-13-03	OFF				
10-14-03	OFF				
10-15-03	OFF				
10-16-03	OFF				
10-17-03	11:40	7086610	N/A	7.19	
10-18-03	11:40	7286994	139	6.87	200,384
10-19-03	11:40	7489730	141	6.96	202,736
10-20-03	11:40	7692889	141	6.92	203,189
10-21-03	11:40	7898305	143	7.02	203,416
10-22-03	11:40	8101348	141	7.15	203,043
10-23-03	11:40	8298469	137	7.02	197,121
10-24-03	06:40	8450087	133	7.01	151,618
TOTAL		GALLONS	Pumped	→	1,363,477

NO APPARENT
IMPACT ON
RIVER


NO APPARENT
IMPACT ON
RIVER

**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**


Location:	<i>Cedar Chemical, 49 Phillips Road 311, Helena, Arkansas 72342</i>						
Photographer:	<i>Steven L. Henderson</i>				Witness:	<i>Gary Hill, Operator</i>	
Photo #	<i>1</i>	Of	<i>6</i>		Date:	<i>11/09/05</i>	Time: <i>11:24 a.m.</i>
Description:	<i>Primary Pond</i>						
							
Photographer:	<i>Steven L. Henderson</i>				Witness:	<i>Gary Hill, Operator</i>	
Photo #	<i>2</i>	Of	<i>6</i>		Date:	<i>11/09/05</i>	Time: <i>11:24 a.m.</i>
Description:	<i>Primary Pond</i>						
							

**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**


Location:	<i>Cedar Chemical, 49 Phillips Road 311, Helena, Arkansas 72342</i>					
Photographer:	<i>Steven L. Henderson</i>			Witness:	<i>Gary Hill, Operator</i>	
Photo #	<i>3</i>	Of	<i>6</i>	Date:	<i>11/09/05</i>	Time: <i>11:25 a.m.</i>

Description:	<i>Secondary Pond</i>					
						

Photographer:	<i>Steven L. Henderson</i>			Witness:	<i>Gary Hill, Operator</i>	
Photo #	<i>4</i>	Of	<i>6</i>	Date:	<i>11/09/05</i>	Time: <i>11:25 a.m.</i>

Description:	<i>Secondary Pond</i>					
						

**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**

Location:		<i>Cedar Chemical, 49 Phillips Road 242 South, Helena, Arkansas 72342</i>						
Photographer:		<i>Steven L. Henderson</i>			Witness:		<i>Gary Hill, Operator</i>	
Photo #	<i>5</i>	Of	<i>6</i>		Date:	<i>11/09/05</i>	Time:	<i>11:24 a.m.</i>
Description:		<i>Finishing Pond</i>						
								
Photographer:		<i>Steven L. Henderson</i>			Witness:		<i>Gary Hill, Operator</i>	
Photo #	<i>6</i>	Of	<i>6</i>		Date:	<i>11/09/05</i>	Time:	<i>11:24 a.m.</i>
Description:		<i>Finishing Pond</i>						
		